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11 Attorneys for Defendant
12 WG Campana del Rio SH, LLC

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

11 The Southwest Fair Housing Council,
12
13 Plaintiff,
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15 v.
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17 WG Campana del Rio SH, LLC,
18
19 Defendant.
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Case No. 4:19-cv-00179-RM

**DEFENDANT WG CAMPANA
DEL RIO SH, LLC'S ANSWER TO
PLAINTIFF'S SECOND
AMENDED COMPLAINT**

17 Defendant WG Campana del Rio SH, LLC d/b/a Atria Campana Del Rio
18 ("Defendant Campana Del Rio") by and through undersigned counsel, hereby submits its
19 Answer to Plaintiff's Second Amended Complaint. For its Answer, Defendant Campana
20 Del Rio admits, denies, and states as follows:

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PRELIMINARY STATEMENT

22 1. Defendant Campana Del Rio lacks knowledge and information sufficient to
23 admit or deny the allegations in Paragraph 1 of the Second Amended Complaint and,
24 therefore, denies them.

25 2. Defendant Campana Del Rio lacks knowledge and information sufficient to
26 admit or deny the allegations in Paragraph 2 of the Second Amended Complaint and,
27 therefore, denies them.

28 3. Defendant Campana Del Rio lacks knowledge and information sufficient to

1 admit or deny the allegations in Paragraph 3 of the Second Amended Complaint and,
2 therefore, denies them.

3 4. Defendant Campana Del Rio lacks knowledge and information sufficient to
4 admit or deny the allegations in Paragraph 4 of the Second Amended Complaint and,
5 therefore, denies them.

6 5. Defendant Campana Del Rio lacks knowledge and information sufficient to
7 admit or deny the allegations in Paragraph 5 of the Second Amended Complaint and,
8 therefore, denies them.

9 6. Defendant Campana Del Rio lacks knowledge and information sufficient to
10 admit or deny the allegations in Paragraph 6 of the Second Amended Complaint and,
11 therefore, denies them.

12 7. Defendant Campana Del Rio lacks knowledge and information sufficient to
13 admit or deny the allegations in Paragraph 7 of the Second Amended Complaint and,
14 therefore, denies them.

15 **THE PARTIES**

16 8. Defendant Campana Del Rio lacks knowledge and information sufficient to
17 admit or deny the allegations in Paragraph 8 of the Second Amended Complaint and,
18 therefore, denies them.

19 9. Defendant Campana Del Rio lacks knowledge and information sufficient to
20 admit or deny the allegations in Paragraph 9 of the Second Amended Complaint and,
21 therefore, denies them.

22 10. Defendant Campana Del Rio lacks knowledge and information sufficient to
23 admit or deny the allegations in Paragraph 10 of the Second Amended Complaint and,
24 therefore, denies them.

25 11. Defendant Campana Del Rio lacks knowledge and information sufficient to
26 admit or deny the allegations in Paragraph 11 of the Second Amended Complaint and,
27 therefore, denies them.

28 12. Defendant Campana Del Rio lacks knowledge and information sufficient to

1 admit or deny the allegations in Paragraph 12 of the Second Amended Complaint and,
2 therefore, denies them.

3 13. Defendant Campana Del Rio lacks knowledge and information sufficient to
4 admit or deny the allegations in Paragraph 13 of the Second Amended Complaint and,
5 therefore, denies them.

6 14. Defendant Campana Del Rio denies the allegations in Paragraph 14 of the
7 Second Amended Complaint.

8 15. Defendant Campana Del Rio admits that it is an operator located at 1550 East
9 River Road, Tucson, Arizona 85718, but denies the remaining allegations of Paragraph 15.

10 **JURISDICTION & VENUE**

11 16. Defendant Campana Del Rio asserts that the allegations in Paragraph 16 of
12 the Second Amended Complaint call for a legal conclusion for which a response is neither
13 necessary nor appropriate and, therefore, denies the same.

14 17. Defendant Campana Del Rio asserts that the allegations in Paragraph 17 of
15 the Second Amended Complaint call for a legal conclusion for which a response is neither
16 necessary nor appropriate and, therefore, denies the same.

17 **STATEMENT OF FACTS**

18 **SWFHC Testing**

19 18. Defendant Campana Del Rio lacks knowledge and information sufficient to
20 admit or deny the allegations in Paragraph 18 of the Second Amended Complaint and,
21 therefore, denies them.

22 19. Defendant Campana Del Rio lacks knowledge and information sufficient to
23 admit or deny the allegations in Paragraph 19 of the Second Amended Complaint and,
24 therefore, denies them.

25 **Factual Allegations Against Defendant**

26 20. Defendant Campana Del Rio lacks knowledge and information sufficient to
27 admit or deny the allegations in Paragraph 20 of the Second Amended Complaint and,
28 therefore, denies them.

COUNT I:**VIOLATIONS OF THE FAIR HOUSING ACT AGAINST DEFENDANT**

21. In response to Paragraph 21 of Plaintiff's Second Amended Complaint, Defendant Campana Del Rio incorporates its responses to Paragraphs 1 through 20 as if fully restated herein.

22. With respect to the allegations in Paragraph 22 of the Second Amended Complaint, the FHA speaks for itself and, to the extent Plaintiff summarizes it, Defendant Campana Del Rio denies such allegations. The remainder of the allegations call for a legal conclusion for which a response is neither necessary nor appropriate and, Defendant Campana Del Rio, therefore, denies the same.

23. With respect to the allegations in Paragraph 23 of the Second Amended Complaint, the FHA speaks for itself and, to the extent Plaintiff summarizes it, Defendant Campana Del Rio denies such allegations. The remainder of the allegations call for a legal conclusion for which a response is neither necessary nor appropriate and, Defendant Campana Del Rio, therefore, denies the same.

24. With respect to the allegations in Paragraph 24 of the Second Amended Complaint, the FHA speaks for itself and, to the extent Plaintiff summarizes it, Defendant Campana Del Rio denies such allegations. The remainder of the allegations call for a legal conclusion for which a response is neither necessary nor appropriate and, Defendant Campana Del Rio, therefore, denies the same.

25. With respect to the allegations in Paragraph 25 of the Second Amended Complaint, the FHA speaks for itself and, to the extent Plaintiff summarizes it, Defendant Campana Del Rio denies such allegations. The remainder of the allegations call for a legal conclusion for which a response is neither necessary nor appropriate and, Defendant Campana Del Rio, therefore, denies the same.

26. With respect to the allegations in Paragraph 26 of the Second Amended Complaint, the FHA speaks for itself and, to the extent Plaintiff summarizes it, Defendant Campana Del Rio denies such allegations. The remainder of the allegations call for a legal

1 conclusion for which a response is neither necessary nor appropriate and, Defendant
2 Campana Del Rio, therefore, denies the same.

3 27. Defendant Campana Del Rio denies the allegations in Paragraph 27 of the
4 Second Amended Complaint.

5 28. Defendant Campana Del Rio denies the allegations in Paragraph 28 of the
6 Second Amended Complaint.

7 29. Defendant Campana Del Rio denies the allegations in Paragraph 29 of the
8 Second Amended Complaint.

9 30. Defendant Campana Del Rio denies the allegations in Paragraph 30 of the
10 Second Amended Complaint.

11 31. Defendant Campana Del Rio denies the allegations in Paragraph 31 of the
12 Second Amended Complaint.

13 **COUNT II:**

14 **VIOLATIONS OF SECTION 504 OF THE REHABILITATION** 15 **ACT AGAINST DEFENDANT**

16 32. In response to Paragraph 32 of Plaintiff's Second Amended Complaint,
17 Defendant Campana Del Rio incorporates its responses to Paragraphs 1 through 31 as if
18 fully restated herein.

19 33. With respect to the allegations in Paragraph 33 of the Second Amended
20 Complaint, Defendant Campana Del Rio admits the existence of the Rehabilitation Act and
21 that Plaintiff brings a cause of action under that law. Defendant Campana Del Rio denies
22 any liability thereunder.

23 34. With respect to the allegations in Paragraph 34 of the Second Amended
24 Complaint, Defendant Campana Del Rio admits the existence of implementing regulations
25 for Section 504 of the Rehabilitation Act. The regulations speak for themselves and, to the
26 extent Plaintiff attempts to summarize it, Defendant Campana Del Rio denies such
27 allegations. The remainder of the allegations call for a legal conclusion for which a
28 response is neither necessary nor appropriate and Defendant Campana Del Rio, therefore,

1 denies the same.

2 35. Defendant Campana Del Rio denies the allegations in the first sentence of
3 Paragraph 35 of the Second Amended. Defendant Campana Del Rio asserts that the
4 allegations in the second sentence of Paragraph 35 call for legal conclusion for which a
5 response is neither necessary nor appropriate and, therefore, denies the same.

6 36. With respect to the allegations in Paragraph 36 of the Second Amended
7 Complaint, the Rehabilitation Act speaks for itself and, to the extent Plaintiff attempts to
8 summarize it, Defendant Campana Del Rio denies such allegations. The remainder of the
9 allegations call for a legal conclusion for which a response is neither necessary nor
10 appropriate and Defendant Campana Del Rio, therefore, denies the same.

11 37. Defendant Campana Del Rio denies the allegations in Paragraph 37 of the
12 Second Amended Complaint.

13 38. With respect to the allegations in Paragraph 38 of the Second Amended
14 Complaint, Defendant Campana Del Rio admits the existence of implementing regulations
15 for Section 504 of the Rehabilitation Act. The Act speak for itself and, to the extent
16 Plaintiff attempts to summarize it, Defendant Campana Del Rio denies such allegations.
17 The remainder of the allegations call for a legal conclusion for which a response is neither
18 necessary nor appropriate and Defendant Campana Del Rio, therefore, denies the same.

19 39. Defendant Campana Del Rio denies the allegations in Paragraph 39 of the
20 Second Amended Complaint.

21 40. With respect to the allegations in Paragraph 40 of the Second Amended
22 Complaint, Defendant Campana Del Rio admits the existence of implementing regulations
23 for Section 504 of the Rehabilitation Act. The regulations speak for themselves and, to the
24 extent Plaintiff attempts to summarize it, Defendant Campana Del Rio denies such
25 allegations. The remainder of the allegations call for a legal conclusion for which a
26 response is neither necessary nor appropriate and Defendant Campana Del Rio, therefore,
27 denies the same.

28 41. With respect to the allegations in Paragraph 41 of the Second Amended

1 Complaint, Defendant Campana Del Rio admits the existence of implementing regulations
 2 for Section 504 of the Rehabilitation Act. The regulations speak for themselves and, to the
 3 extent Plaintiff attempts to summarize it, Defendant Campana Del Rio denies such
 4 allegations. The remainder of the allegations call for a legal conclusion for which a
 5 response is neither necessary nor appropriate and Defendant Campana Del Rio, therefore,
 6 denies the same.

7 42. Defendant Campana Del Rio denies the allegations in Paragraph 42 of the
 8 Second Amended Complaint.

9 43. Defendant Campana Del Rio denies the allegations in Paragraph 43 of the
 10 Second Amended Complaint.

11 44. Defendant Campana Del Rio denies the allegations in Paragraph 44 of the
 12 Second Amended Complaint.

13 **CLAIM III:**

14 **VIOLATIONS OF TITLE III OF THE AMERICANS WITH DISABILITIES ACT** 15 **AGAINST THE FOLLOWING DEFENDANTS:**

16 45. In response to Paragraph 45 of Plaintiff's Second Amended Complaint,
 17 Defendant Campana Del Rio incorporates its responses to Paragraphs 1 through 44 as if
 18 fully restated herein.

19 46. Answering Paragraph 46 of the Second Amended Complaint, Defendant
 20 Campana Del Rio admits the existence of Title III of the ADA, but denies any liability
 21 thereunder.

22 47. With respect to the allegations in Paragraph 47 of the Second Amended
 23 Complaint, Defendant Campana Del Rio admits the existence of implementing regulations
 24 for Title III of the ADA. The regulations speak for themselves and, to the extent Plaintiff
 25 attempts to summarize it, Defendant Campana Del Rio denies such allegations. The
 26 remainder of the allegations call for a legal conclusion for which a response is neither
 27 necessary nor appropriate and Defendant Campana Del Rio, therefore, denies the same.

28 48. Answering Paragraph 48, Defendant Campana Del Rio asserts that the

1 allegations call for a legal conclusion for which a response is neither necessary nor
2 appropriate and, therefore, denies the same.

3 49. With respect to the allegations in Paragraph 49 of the Second Amended
4 Complaint, the ADA and its implementing regulations speak for themselves and, to the
5 extent Plaintiff attempts to summarize it, Defendant Campana Del Rio denies such
6 allegations. The remainder of the allegations call for a legal conclusion for which a
7 response is neither necessary nor appropriate and Defendant Campana Del Rio, therefore,
8 denies the same.

9 50. With respect to the allegations in Paragraph 50 of the Second Amended
10 Complaint, the ADA and its implementing regulations speak for themselves and, to the
11 extent Plaintiff attempts to summarize it, Defendant Campana Del Rio denies such
12 allegations. The remainder of the allegations call for a legal conclusion for which a
13 response is neither necessary nor appropriate and Defendant Campana Del Rio, therefore,
14 denies the same.

15 51. With respect to the allegations in Paragraph 51 of the Second Amended
16 Complaint, the ADA and its implementing regulations speak for themselves and, to the
17 extent Plaintiff attempts to summarize it, Defendant Campana Del Rio denies such
18 allegations. The remainder of the allegations call for a legal conclusion for which a
19 response is neither necessary nor appropriate and Defendant Campana Del Rio, therefore,
20 denies the same.

21 52. With respect to the allegations in Paragraph 52 of the Second Amended
22 Complaint, the ADA and its implementing regulations speak for themselves and, to the
23 extent Plaintiff attempts to summarize it, Defendant Campana Del Rio denies such
24 allegations. The remainder of the allegations call for a legal conclusion for which a
25 response is neither necessary nor appropriate and Defendant Campana Del Rio, therefore,
26 denies the same.

27 53. With respect to the allegations in Paragraph 53 of the Second Amended
28 Complaint, the ADA and its implementing regulations speak for themselves and, to the

1 extent Plaintiff attempts to summarize it, Defendant Campana Del Rio denies such
2 allegations. The remainder of the allegations call for a legal conclusion for which a
3 response is neither necessary nor appropriate and Defendant Campana Del Rio, therefore,
4 denies the same.

5 54. Defendant Campana Del Rio denies the allegations in Paragraph 54 of the
6 Second Amended Complaint.

7 55. Defendant Campana Del Rio denies the allegations in Paragraph 55 of the
8 Second Amended Complaint.

9 56. Defendant Campana Del Rio denies the allegations in Paragraph 56 of the
10 Second Amended Complaint.

11 **COUNT IV:**

12 **VIOLATIONS OF SECTION 1557 OF THE PATIENT** 13 **PROTECTION AND AFFORDABLE CARE ACT**

14 57. In response to Paragraph 57 of Plaintiff's Second Amended Complaint,
15 Defendant Campana Del Rio incorporates its responses to Paragraphs 1 through 56 as if
16 fully restated herein.

17 58. With respect to the allegations in Paragraph 58 of the Second Amended
18 Complaint, Defendant Campana Del Rio admits the existence of the Patient Protection and
19 Affordable Care Act and its implementing regulations. The regulations speak for
20 themselves and, to the extent Plaintiff attempts to summarize them, Defendant Campana
21 Del Rio denies such allegations. The remainder of the allegations call for a legal
22 conclusion for which a response is neither necessary nor appropriate and Defendant
23 Campana Del Rio, therefore, denies the same.

24 59. With respect to the allegations in Paragraph 59 of the Second Amended
25 Complaint, Defendant Campana Del Rio admits the existence of the Rehabilitation Act and
26 Affordable Care Act and their implementing regulations. The regulations speak for
27 themselves and, to the extent Plaintiff attempts to summarize them, Defendant Campana
28 Del Rio denies such allegations. The remainder of the allegations call for a legal

1 conclusion for which a response is neither necessary nor appropriate and Defendant
2 Campana Del Rio, therefore, denies the same.

3 60. Defendant Campana Del Rio denies the allegations in the first sentence of
4 Paragraph 60 of the Second Amended. Defendant Campana Del Rio asserts that the
5 allegations in the second sentence of Paragraph 60 call for legal conclusion for which a
6 response is neither necessary nor appropriate and, therefore, denies the same.

7 61. With respect to the allegations in Paragraph 61 of the Second Amended
8 Complaint, the ACA and its implementing regulations speak for themselves and, to the
9 extent Plaintiff attempts to summarize them, Defendant Campana Del Rio denies such
10 allegations. The remainder of the allegations call for a legal conclusion for which a
11 response is neither necessary nor appropriate and Defendant Campana Del Rio, therefore,
12 denies the same.

13 62. With respect to the allegations in Paragraph 62 of the Second Amended
14 Complaint, the ACA and its implementing regulations speak for themselves and, to the
15 extent Plaintiff attempts to summarize them, Defendant Campana Del Rio denies such
16 allegations. The remainder of the allegations call for a legal conclusion for which a
17 response is neither necessary nor appropriate and Defendant Campana Del Rio, therefore,
18 denies the same.

19 63. With respect to the allegations in Paragraph 63 of the Second Amended
20 Complaint, the ACA and its implementing regulations speak for themselves and, to the
21 extent Plaintiff attempts to summarize them, Defendant Campana Del Rio denies such
22 allegations. The remainder of the allegations call for a legal conclusion for which a
23 response is neither necessary nor appropriate and Defendant Campana Del Rio, therefore,
24 denies the same.

25 64. With respect to the allegations in Paragraph 64 of the Second Amended
26 Complaint, the ACA and its implementing regulations speak for themselves and, to the
27 extent Plaintiff attempts to summarize them, Defendant Campana Del Rio denies such
28 allegations. The remainder of the allegations call for a legal conclusion for which a

1 response is neither necessary nor appropriate and Defendant Campana Del Rio, therefore,
2 denies the same.

3 65. Defendant Campana Del Rio denies the allegations in Paragraph 65 of the
4 Second Amended Complaint.

5 66. Defendant Campana Del Rio denies the allegations in Paragraph 66 of the
6 Second Amended Complaint.

7 67. Defendant Campana Del Rio denies the allegations in Paragraph 67 of the
8 Second Amended Complaint.

9 **COUNT V:**
10 **VIOLATIONS OF THE ARIZONA FAIR HOUSING**
11 **ACT AGAINST DEFENDANT**

12 68. In response to Paragraph 68 of Plaintiff's Second Amended Complaint,
13 Defendant Campana Del Rio incorporates its responses to Paragraphs 1 through 67 as if
14 fully restated herein.

15 69. Answering Paragraph 69 of the Second Amended Complaint, Defendant
16 Campana Del Rio admits that Plaintiff brings this action under the Arizona Fair Housing
17 Act, but denies it violated that statute.

18 70. The allegations of Paragraph 70 of the Second Amended Complaint call for a
19 legal conclusion for which a response is neither necessary no appropriate and Defendant
20 Campana Del Rio, therefore, denies the same.

21 71. With respect to the allegations in Paragraph 71 of the Second Amended
22 Complaint, Defendant Campana Del Rio admits the existence of the Arizona Fair Housing
23 Act. The Act speak for itself and, to the extent Plaintiff attempts to summarize it,
24 Defendant Campana Del Rio denies such allegations. The remainder of the allegations call
25 for a legal conclusion for which a response is neither necessary nor appropriate and
26 Defendant Campana Del Rio, therefore, denies the same.

27 72. With respect to the allegations in Paragraph 72 of the Second Amended
28 Complaint, Defendant Campana Del Rio admits the existence of the Arizona Fair Housing
Act. The Act speak for itself and, to the extent Plaintiff attempts to summarize it,

1 Defendant Campana Del Rio denies such allegations. The remainder of the allegations call
2 for a legal conclusion for which a response is neither necessary nor appropriate and
3 Defendant Campana Del Rio, therefore, denies the same.

4 73. With respect to the allegations in Paragraph 73 of the Second Amended
5 Complaint, Defendant Campana Del Rio admits the existence of the Arizona Fair Housing
6 Act. The Act speak for itself and, to the extent Plaintiff attempts to summarize it,
7 Defendant Campana Del Rio denies such allegations. The remainder of the allegations call
8 for a legal conclusion for which a response is neither necessary nor appropriate and
9 Defendant Campana Del Rio, therefore, denies the same.

10 74. Defendant Campana Del Rio denies the allegations in Paragraph 74 of the
11 Second Amended Complaint.

12 75. Defendant Campana Del Rio denies the allegations in Paragraph 75 of the
13 Second Amended Complaint.

14 76. Defendant Campana Del Rio denies the allegations in Paragraph 76 of the
15 Second Amended Complaint.

16 77. Defendant Campana Del Rio denies the allegations in Paragraph 77 of the
17 Second Amended Complaint.

18 78. Defendant Campana Del Rio denies the allegations in Paragraph 78 of the
19 Second Amended Complaint.

20 **GENERAL DENIAL**

21 Any allegations not specifically admitted in response to Plaintiff's Second Amended
22 Complaint are denied. Defendant Campana Del Rio further denies that Plaintiff is entitled to
23 judgment against it or that Plaintiff is entitled to an award of damages in any amount, and
24 specifically denies that Plaintiff is entitled to the relief sought in the prayer for relief
25 following Paragraphs 1-78 of the Second Amended Complaint.
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DEFENSES AND OTHER AVOIDANCES

Defendant Campana Del Rio alleges the following defenses, some of which are affirmative defenses:

1. With respect to some or all of Plaintiff's claims, Plaintiff's Second Amended Complaint fails to state a claim upon which relief can be granted.

2. Plaintiff lacks standing to bring some or all of its claims in this lawsuit.

3. Plaintiff's Second Amended Complaint is barred in whole, or in part, by the doctrines of estoppel, unclean hands, laches, and/or waiver.

4. Plaintiff has failed to mitigate its damages.

5. Some or all of Plaintiff's proposed modifications and/or accommodations would fundamentally alter the nature of such goods, services, facilities, privileges, advantages, or accommodations.

6. Some or all of Plaintiff's proposed modifications and/or accommodations would result in an undue burden.

7. Auxiliary aids and/or alternative means for effective communication were and are provided by Defendant Campana Del Rio.

8. Defendant Campana Del Rio has acted reasonably and in good faith, without malice or intent to injure Plaintiff, and with reasonable grounds to believe that its actions and omissions were not discriminatory and were not in violation of any applicable laws or regulations such that an award of punitive damages would be improper.

9. Defendant Campana Del Rio had neither active nor constructive knowledge of any barriers to effective communication and, if such barriers existed, Defendant Campana Del Rio properly complied with applicable laws.

10. Some or all of Defendant Campana Del Rio's actions in this matter were taken in reliance upon the standards and guidelines of the Americans with Disabilities Act and/or state law and regulations, as appropriate, and were reasonably prudent under the circumstances.

1 11. While maintaining that Plaintiff did not request any accommodation as alleged
2 in the Second Amended Complaint, Defendant Campana Del Rio alleges in the alternative
3 that it did not refuse to make reasonable accommodations in rules, policies, practices, or
4 services, when such accommodations may have been necessary to afford deaf individuals
5 equal opportunity to use and enjoy a dwelling.

6 12. Defendant Campana Del Rio avers that it is in compliance with any and all
7 applicable laws to which it is subject.

8 13. Plaintiff was not denied benefits of a program solely by reason of a disability.

9 14. Plaintiff's proposed modifications and/or accommodations as alleged in the
10 Second Amended Complaint are not readily achievable.

11 15. Defendant Campana Del Rio did not intentionally discriminate against Plaintiff
12 and/or act with deliberate indifference to the rights of Plaintiff.

13 16. Plaintiff cannot recover compensatory and/or punitive damages for some or all
14 of their claims.

15 17. Plaintiff has sustained no actual damages.

16 Defendant Campana Del Rio reserves the right to add additional denials, avowals,
17 admissions, and/or affirmative defenses, pursuant to Rule 8, Federal Rules of Civil
18 Procedure.

19 WHEREFORE, having fully answered Plaintiff's Second Amended Complaint,
20 Defendant Campana Del Rio prays that:

21 A. Plaintiff's Second Amended Complaint be dismissed with prejudice and that
22 Plaintiff take nothing thereby; and

23 B. Defendant Campana Del Rio be awarded its reasonable attorneys' fees and
24 costs on those claims where permitted by law.

25 For such other and further relief that the Court deems just and proper.
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1 DATED this 7th day of August, 2019.

2
3 s/ Ryan G. Lockner

4 R. Shawn Oller

5 Ryan G. Lockner

6 LITTLER MENDELSON, P.C.

Attorneys for Defendant

WG Campana del Rio SH, LLC

7 I hereby certify that I electronically
8 transmitted the attached document to the
9 clerk's Office using the CM/ECF System for
10 filing and transmittal of a Notice of
11 Electronic Filing to the following CM/ECF
registrants, and mailed a copy of same to the
following if non-registrants, this 7th day of
August, 2019.

12 Eric Baum

Andrew Rozynski

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